

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

FILED

2017 FEB 16 P 1:08

KENNETH GAYNOR, et al., Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

DELOY MILLER, et al.,

Defendants.

Civil Action No. 3:15-CV-00545-TAV-CCS

(Consolidated)

CLASS ACTION

JURY DEMAND

**MOTION TO DISMISS AND ANSWER OF SEPARATE DEFENDANT
GERALD HANNAHS TO MASTER CONSOLIDATED COMPLAINT**

Comes Separate Defendant Gerald Hannahs and for his Motion to Dismiss and Answer to the Master Consolidated Complaint states:

1. Separate Defendant Gerald Hannahs denies each and every material allegation set forth in the Master Consolidated Complaint (herein referred to as the "Complaint") unless specifically admitted herein.

2. I specifically deny that this Court has jurisdiction over me.

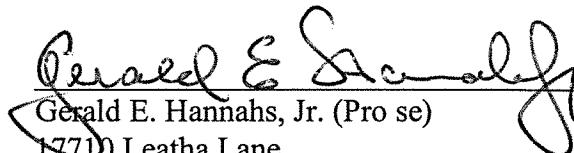
3. I admit that I served as a Director of Miller Energy, however, I specifically deny any wrongdoing with respect to any of the allegations set forth in the Complaint, including but not limited to any registration statements that were utilized to conduct offerings. In connection with those allegations, I specifically relied upon the information provided to me as a Director by individuals and entities that were involved with the accounting processes of Miller Energy.

4. At all relevant times, as stated above, I relied upon those individuals in charge of accounting at Miller Energy and its outside accountants to properly account for all assets and

determinations of value relating to the company. I specifically deny all the allegations set forth in the Complaint relating to violations of federal securities laws and any other wrongdoing, including but not limited to the allegations set forth in Count I, Count II and Count III of the Complaint.

5. I adopt and incorporate all motions and pleadings of all the other defendants in this lawsuit as it fully set forth in my Answer.

Respectfully submitted,


Gerald E. Hannahs, Jr. (Pro se)
17710 Leatha Lane
Little Rock, Arkansas 72223
Phone: (501) 804-1300

CERTIFICATE OF SERVICE

I, Gerald E. Hannahs, Jr., do hereby certify that I have sent via:

XXX U.S. Mail, postage prepaid

 Hand-delivery

 Facsimile

 Electronic Mail

 Federal Court ECF System to the Clerk of the Court for filing and transmittal
of Notice of Electronic Filing to ECF registrants

this 17th day of February, 2017 a true and complete copy of the foregoing attached document to
the following individual(s):

Mr. Jack Reise

-via U.S. Mail to: 120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432

Mr. Christopher Wood

-via U.S. Mail to: 414 Union Street, Suite 900
Nashville, TN 37219

Mr. Douglas Johnston

-via U.S. Mail to: Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219

Mr. Jerry Martin

-via U.S. Mail to: Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219

Mr. Timothy Miles

-via U.S. Mail to: Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219

Mr. Curtis Trinko

-via U.S. Mail to: 16 West 46th Street, 7th Floor
New York, NY 10036

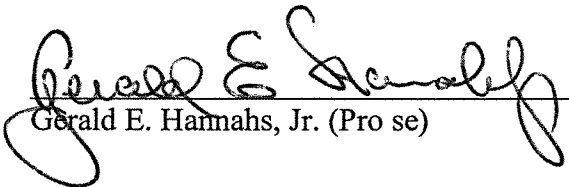
Mr. David Voyticky
-via U.S. Mail to: 2652 Midvale Avenue
Los Angeles, CA 90064

Mr. William Richardson
-via U.S. Mail to: 1058 Encantado Drive
Santa Fe, NM 87501

Mr. Paul Boyd
-via U.S. Mail to: 8125 Ainsworth Drive
Knoxville, TN 37909

Mr. Charles Stivers
-via U.S. Mail to: 118 Richmond Road
Manchester, KY 40962

Mr. Scott Boruff
-via U.S. Mail to: 5628 Lyons View Pike
Knoxville, TN 37919


Gerald E. Hammahs, Jr. (Pro se)